

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

In Re: Tyson Foods, Inc., Chicken Raised
Without Antibiotics Consumer Litigation

1:08-md-01982-RDB

ALL ACTIONS

DECLARATION OF JENNIFER M. KEOUGH
IN SUPPORT OF PLAINTIFFS' RESPONSE TO OBJECTIONS

JENNIFER M. KEOUGH declares and states as follows:

1. I am Executive Vice President, Operations of The Garden City Group, Inc. ("GCG"). The following statements are based on my personal knowledge and information provided by other GCG employees working under my supervision, and if called on to do so, I could and would testify competently thereto. GCG has been providing comprehensive legal administration services for over 25 years. Our team has served as administrator for well over 1,000 cases. In the course of our history, we have mailed over 227 million notices, handled over 3 million calls, processed over 41 million claims, and distributed over \$22 billion.

2. GCG was retained in the above-captioned litigation to serve as the Settlement Administrator. As of April 29, 2010, GCG has received 1,469 telephone calls to the 1-800 number established in connection with this litigation, and 1,184 of the callers have received live support. In addition, GCG has received 436 letters, all of which were ministerial, non-substantive requests for copies of the notice or claim forms issued in connection with the settlement. The www.ChickenSettlement.com website has experienced 50,489 visits. More

than 12,185 class members have filed claims. The vast majority of the claims (89.75%) have been filed online. Approximately 3% of class members have filed Tier 1 claims, 85% of class members have filed Tier 2 claims, and 12% of class members have filed Tier 3 claims. The deadline to file claims is still more than two months away, closing on July 6, 2010.

3. Two class members requested to be excluded from the settlement.

I declare under penalty of perjury under the laws of the State of Maryland that the foregoing is true and correct.

Executed on April 30, 2010 at Seattle, Washington.



Jennifer M. Keough